

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEVEN L. WYRICK,

Defendant.

Case No. 94-00194-12-CR-W-GAF

**MOTION OF THE UNITED STATES FOR AN EXTENSION OF TIME TO FILE
ITS RESPONSE TO DEFENDANT’S MOTION FOR COMPASSIONATE RELEASE**

The United States of America, by and through the United States Attorney Teresa A. Moore, and undersigned counsel, both for the Western District of Missouri, hereby respectfully request leave to file a response out of time and an additional fourteen (14) days from the date of this Court’s order to respond to the Defendant’s motion for sentence reduction. (D.E. 1133.)

Defendant filed his motions for a sentence reduction on December 19, 2023. The response of the United States is due today, January 22, 2024. Government counsel requests 14 additional days, until February 5, 2024, in which to have our office’s appellate unit review said response, prior to filing.

THEREFORE, based on the foregoing reasons, the United States respectfully requests an additional 14 days from this Court’s order in which to file its response to the defendant’s motion.

Respectfully submitted,

Teresa A. Moore
United States Attorney

By /s/Joseph M. Marquez

Joseph M. Marquez
Assistant United States Attorney
Charles Evans Whittaker Courthouse
400 East Ninth Street, Suite 5510
Kansas City, Missouri 64106
Telephone: (816) 426-3122

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on January 22, 2024 to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record and USPS Certified Return/Receipt to the defendant at:

Keven Wyrick
Reg. No. 08724-045
USP Leavenworth
P.O. Box 1000
Leavenworth, Kansas 66048

/s/ Joseph M. Marquez
Joseph M. Marquez
Assistant United States Attorney